

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

KATHY BRADLEY, LOIS HESS, AND
KAY KLAUSNER,

Plaintiff,

vs.

INNER-TITE CORP.,

Defendant.

CIVIL NO. 10-cv-00693-JPG-CJP

DEFENDANT'S MOTION TO TRANSFER

Inner-Tite Corp. ("Inner-Tite"), through its counsel, moves this Court to transfer this matter to the District Court for the District of Massachusetts pursuant to 28 U.S.C. § 1401(a). In support of its motion, Inner-Tite states that this matter should be transferred because venue is proper in the District Court of Massachusetts, the District Court of Massachusetts is more convenient for the parties, witnesses, and proofs required in this case, and transferring this matter to the District Court of Massachusetts would further the interest of justice. For these reasons and the reasons further set forth and detailed in the accompanying memorandum of law which is filed contemporaneously herewith and incorporated herein by reference, this Court should transfer this matter to the United States District Court for the District of Massachusetts pursuant to 28 U.S.C. § 1404(a).

WHEREFORE, Inner-Tite requests that this Court transfer this case pursuant to 28 U.S.C. § 1404(a) and that this Court award to Inner-Tite such further relief as this Court deems just and equitable.

Respectfully submitted,

INNER-TITE CORP.

By: /s/ Rebecca M. Rothmann
One of its attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th of November, 2010, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operations of the Court's electronic filing systems to all parties indicated on the electronic filing receipt. All other parties will be served by Regular U. S. Mail. Parties may access this filing through the Court's System.

/s/ Rebecca M. Rothmann
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